

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Akeel Abdul Jamiel

Write the full name of each plaintiff.

-against-

Chief Robert Mir
Detective Scott J. Galligan

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

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2017 OCT -3 AM 10:38

No. **17CV7559**
(To be filled out by Clerk's Office)

COMPLAINT
(Prisoner)

Do you want a jury trial?

☒ Yes ☐ No

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other:

WRONGFUL ACCUSATIONS IN A CRIMINAL PROCEEDING.

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

Akeel

First Name

Abdul

Middle Initial

Jamiel

Last Name

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

Sullivan County Jail

Current Place of Detention

4 Bushnell Ave.

Institutional Address

Sullivan, Monticello, N.Y.

County, City

State

12701

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☐ Convicted and sentenced prisoner

☐ Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1: Robert McR (UNKNOWN)
 First Name Last Name Shield #

Chief

Current Job Title (or other identifying information)

Monticello, N.Y. Police Dept., 2 Pleasant St.

Current Work Address

Sullivan, Monticello, N.Y.

12701

County, City

State

Zip Code

Defendant 2: Scott Galligan (UNKNOWN)
 First Name Last Name Shield #

Detective.

Current Job Title (or other identifying information)

Monticello, N.Y. Police Dept., 2 Pleasant St.

Current Work Address

Sullivan, Monticello, N.Y.

12701.

County, City

State

Zip Code

Defendant 3:
 First Name Last Name Shield #

Current Job Title (or other identifying information)

Current Work Address

County, City

State

Zip Code

Defendant 4:
 First Name Last Name Shield #

Current Job Title (or other identifying information)

Current Work Address

County, City

State

Zip Code

V. STATEMENT OF CLAIM

Place(s) of occurrence: Monticello Police Dept. & Sullivan County Jail.

Date(s) of occurrence: between April 27th, 2017 to Current.

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

Please see enclosed exhibits labeled "A thru E"! ON April 27th, 2017, I was arrested & booked into Sullivan County Jail, in Monticello, N.Y., upon the belief's of a triple accusatory of 3 Felony Complaints, from Detective Scott J. Galligan, of Criminal Use of a firearm, Assault in the 1st Degree & Criminal Possession of a weapon. I have been wrongfully charged & detained by this Detective & the Monticello, N.Y. Police Department, along with Monticello Police Chief Robert Mir, whom both of these individuals acted in concert, to manipulate & change the paperwork of a said amount of a "Controlled Substance", Known as Cocaine! (See Exhibit D & E)! On the "Original arrest Report" & "Property seizure form", that was issued & documented by them, the stated amount of "Cocaine" said to have been in my possession, dramatically increased from the originally reported weight of said narcotic, to a "staggering" 73 grams, as to the "Slim" amount that was originally weighed & Reported. Meaning specifically, that between,

April 27th, 2017 to July 7th, 2017, the defendants "purposely & knowingly", intended, to demean my character, of slander, & to Co-hearse the Forensic Scientist III, "Racheal Stubbs", to dramatically increase the weight of the Controlled Substance, to "strengthen" the accusatory instruments of a felony possession, for a Co-hearsed prosecution, which ultimately leads to a lengthy incarceration, due to the Negligence & Police mis-conduct & incrimination of the defendants, in my case.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Due to the Negligence of the defendants, & their abuse of authority as Police officers & "Supposed Public Servants", I now suffer from depression & anxiety, as I have no control over what they are wrongfully doing to me & to purposely over manipulate their positions! I am mentally damaged by their actions & mis-conduct.

VI. RELIEF

State briefly what money damages or other relief you want the court to order.

I am seeking the sum of \$ 75,000,000.00 (Seventy Five Million Dollars). I am also in request of a "Full Investigation" from this Court in regards to my complaint against the defendants. I request to be assigned "Pro Bono Counsel" to assist me in the litigation process & to seek also a permanent solution to any further mis-conduct against me from the defendants, in my pending Criminal case in Sullivan County.

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

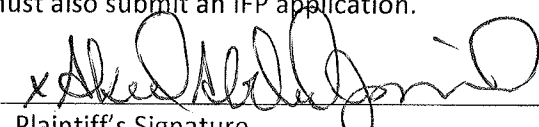
I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

9/22/17
 Dated


 Plaintiff's Signature

Akeel Abdul Jamiel
 First Name Middle Initial Last Name

Sullivan County Jail, 4 Bushnell Ave.
 Prison Address

Sullivan, Monticello, N.Y. 12701
 County, City State Zip Code

Date on which I am delivering this complaint to prison authorities for mailing:

9/22/17.

11. Provide any other information that will help explain why you cannot pay the docket fees for your ~~case~~ case.

I am indigent & completely financially stricken.

12. Identify the city and state of your legal residence.

City Monticello State N.Y.

Your daytime phone number:

Your age: 38 Your years of schooling: 1 yr college

Last four digits of your social-security number: 7082

D.D. NO.: Case 7:17-cv-07559-KMK Document 2 Filed 10/03/17 Page 8 of 13
Case Report No: MP-00307-17 Police Serial No: Blotter/CC No: MP-004204-17
Appearance Ticket: Return Date...:
Arrest Number....: XX-00013-17 Court Docket No.:
Defendant in Custody from: April 27, 2017 to

(2)

D.O.B.:
(1) 07/01/1979

VILLAGE OF MONTICELLO JUSTICE COURT
10 JEFFERSON ST, MONTICELLO, NY 12701
THE PEOPLE OF THE STATE OF NEW YORK
against

AKEEL ABDUL JAMIEL (37)
28 PRINCE STREET APT 2
MONTICELLO, NY 12701-

(A)

COPY

STATE OF NEW YORK^{SS}
COUNTY OF SULLIVAN

DET SCOTT J GALLIGAN, Shield 635, being duly sworn, deposes and says that he is a member of the MONTICELLO POLICE DEPT, County of SULLIVAN, State of New York and that on the 26 day of April, 2017, at about 2:34 PM at 62 PARK AVE MONTICELLO in the County of SULLIVAN, State of New York.

AKEEL ABDUL JAMIEL

THE DEFENDANT(S) DID VIOLATE NEW YORK STATE PENAL LAW SECTION § PL
265.09-1A

OFFENSE
CRIM USE FIREARM1
CLASS B
FELONY

§ PL 265.09 Subdivision 1A - Criminal use of a firearm in the first degree. A person is guilty of criminal use of a firearm in the first degree when he commits any class B violent felony offense as defined in paragraph (a) of subdivision one of section 70.02 and he possesses a deadly weapon, if the weapon is a loaded weapon from which a shot, readily capable of producing death or other serious injury may be discharged.

TO WIT: On the aforementioned date, time and location the above mentioned defendant did commit the offense of Assault in the first degree by shooting Keith Jackson with a loaded handgun resulting in the victim sustaining gun shot wounds to the hands. Said victim required reconstructive hand surgery to his left hand. All contrary to the provision of the statute made in such case and provided.

Prepared By
DET S GALLIGAN

This complaint is based on personal knowledge and information and belief, the source being, POLICE INVESTIGATION

Any false statements made herein are punishable as a Class A Misdemeanor pursuant to Section 210.45 of the Penal Law.

Subscribed and sworn to before me
this 27, day of April, 2017

4/27/17

SCOTT J GALLIGAN
DETECTIVE

SP/655

SCOTT J GALLIGAN
DETECTIVE

D.D. NO.: Case 7:17-cv-07559-KMK Document 2 Filed 10/03/17 Page 9 of 13
Case Report No: MP-00307-17 Police Serial No: Blotter/CC #: MP-004204-17
Appearance Ticket: Return Date: :
Arrest Number....:XX-00013-17 Court Docket No: :
Defendant in Custody from: April 27, 2017 to

VILLAGE OF MONTICELLO JUSTICE COURT
10 JEFFERSON ST, MONTICELLO, NY 12701
THE PEOPLE OF THE STATE OF NEW YORK
against

AKEEL ABDUL JAMIEL (37)
28 PRINCE STREET APT 2
MONTICELLO, NY 12701-

D.O.B.:
(1) 07/01/1979

STATE OF NEW YORK^{SS}
COUNTY OF SULLIVAN

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AKEEL ABDUL JAMIEL

THE DEFENDANT(S) DID VIOLATE NEW YORK STATE PENAL LAW SECTION § PL 120.10-1

OFFENSE
ASSAULT 1
CLASS B
FELONY

§ PL 120.10 Subdivision 1 - Assault in the first degree. A person is guilty of assault in the first degree when with intent to cause serious physical injury to another person, he causes such injury to such person or to a third person by means of a deadly weapon or a dangerous instrument.

TO WIT: On the aforementioned date, time and location the above mentioned defendant did intentionally cause serious physical injury to Keith Jackson by shooting said victim with a handgun. Said victim sustained injuries to both hands and required reconstructive surgery to the victims left hand. All contrary to the provisions of the statute made in such case and provided.

Prepared By
DET S GALLIGAN

This complaint is based on personal knowledge and information and belief, the source being, POLICE INVESTIGATION

Any false statements made herein are punishable as a Class A Misdemeanor pursuant to Section 210.45 of the Penal Law.

Subscribed and sworn to before me
this 27 day of April, 2017

4/27/17

SCOTT J GALLIGAN
DETECTIVE

JP/655

SCOTT J GALLIGAN
DETECTIVE

COPY

B

Arrest Number....:XX-00013-17

Court Docket No: _____

Defendant in Custody from: April 27, 2017 to _____

③

D.O.B.:
(1) 07/01/1979

VILLAGE OF MONTICELLO JUSTICE COURT
10 JEFFERSON ST, MONTICELLO, NY 12701
THE PEOPLE OF THE STATE OF NEW YORK
against

AKEEL ABDUL JAMIEL (37)
28 PRINCE STREET APT 2
MONTICELLO, NY 12701-

② COPY

STATE OF NEW YORK^{SS}
COUNTY OF SULLIVAN

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AKEEL ABDUL JAMIEL

THE DEFENDANT(S) DID VIOLATE NEW YORK STATE PENAL LAW SECTION § PL 265.03-1B

OFFENSE
POSS WEAPON 2
CLASS C
FELONY

§ PL 265.03 Subdivision 1B - Criminal possession of a weapon in the second degree. A person is guilty of criminal possession of a weapon in the second degree when with intent to use the same unlawfully against another, such person possesses a loaded firearm.

★ TO WIT: On the aforementioned date, time and location the above mentioned defendant did possess with the intent to use the same, a loaded handgun against Keith Jackson by shooting said victim in his hands causing injury. All contrary to the provisions of the statute made in such case and provided.

Prepared By
DET S GALLIGAN

This complaint is based on personal knowledge and information and belief, the source being, POLICE INVESTIGATION

Any false statements made herein are punishable as a Class A Misdemeanor pursuant to Section 210.45 of the Penal Law.

Subscribed and sworn to before me
this 27 day of April, 2017

4/27/17
SCOTT J GALLIGAN
DETECTIVE

JP/635
SCOTT J GALLIGAN
DETECTIVE



**State
Police**

**Mid-Hudson Satellite
Crime Laboratory**

ANDREW M. CUOMO
Governor

GEORGE P. BEACH II
Superintendent

RAY A. WICKENHEISER
Director

CONTROLLED SUBSTANCES REPORT

TO:

Chief Robert Mir
Monticello Village Police Department
2 Pleasant Street
Monticello, NY 12701

July 07, 2017
Lab Case # 17TF-00049
Agency Case #
MP-00307-17

SUBJECT:

**JACKSON, KEITH
VICTIM
JAMIEL, AKEEL ABDUL
SUSPECT
April 26, 2017**



EXAMINATION:

Item #11 One (1) plastic bag containing substance with an aggregate weight of 73
(±.1) grams.
Cocaine - Narcotic Drug (1/2 ounce or more)

NOTE:

1. The uncertainty of measurement(s) for item(s) # 11 was estimated using a 99% confidence level (k=2.576).
2. The result(s) of item(s) # 11 was determined using Gas Chromatography/Mass Spectrometry.

(CPL 190.30(2) Certification)

I, Racheal Stubbs, Forensic Scientist III, hereby certify that I am a public servant in the employ of the New York State Police. I further certify this is the original of my report and contains the opinions and interpretations of the examination I performed in the above referenced case.

False Statements made herein are punishable as a class A misdemeanor pursuant to section 210.45 of the Penal Law.

Racheal Stubbs

Joelyn Cornwell

Forensic Scientist III

Supervisor of Forensic Services



July 07, 2017

Lab Case # 17TF-00019

Agency Case #

MP-00307-17

SUBJECT: **JACKSON, KEITH**
 VICTIM

 JAMIEL, AKEEL ABDUL
 SUSPECT

 April 26, 2017

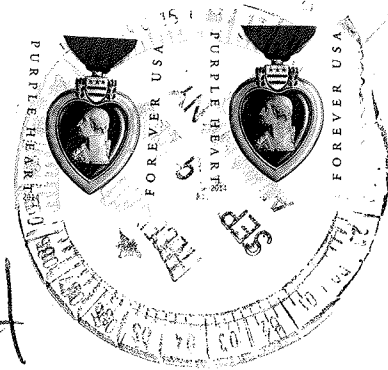
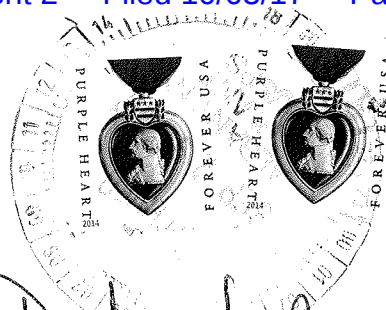
Definitions of terms used in this report can be located within the Report Standardization Manual at <http://criminaljustice.ny.gov/forensic/labreportstandards.htm>. This report does not constitute the entire case file. The case file may be comprised of worksheets, images, analytical data and other documents.

cc: Honorable James R. Farrell
File



11 Avenue
NY 12701

SULLIVAN COUNTY JAIL
4 BUSHNELL AVENUE
MONTICELLO, NY 12701



To:

United States District Court
Southern District of N.Y.
Pro Se Office / Room 230.
500 Pearl St.
New York, N.Y. 10007.